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August 7, 2020

The Honorable Kevin N. Fox
United States Magistrate Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Nygård v. Bacon*, No. 1:19-cv-01559-LGS-KNF
Consent Request for a Stipulated Briefing Schedule for Defendant Louis M.
Bacon's Motion to Dismiss Plaintiff Peter J. Nygard's First Amended Complaint

Dear Judge Fox:

We represent Defendant Louis M. Bacon in the above-referenced matter. Per Section 1.E of Your Honor's Individual Rules, we respectfully request that the Court order the briefing schedule that the parties have agreed to in connection with Mr. Bacon's response to Plaintiff Peter J. Nygard's First Amended Complaint. The schedule that counsel for Plaintiff and Defendant have agreed to is as follows:

- (i) Defendant's motion to dismiss the First Amended Complaint shall be filed by **September 10, 2020**;
- (ii) Plaintiff shall file his opposition to Defendant's motion to dismiss the First Amended Complaint by **October 26, 2020**; and
- (iii) Defendant shall file a reply in support of his motion to dismiss the First Amended Complaint by **November 16, 2020**.

Plaintiff filed his First Amended Complaint on July 27, 2020. Mr. Bacon's response is currently due on August 10, 2020. This is the first request for an extension.

We thank the Court for its consideration.

SIDLEY

Respectfully submitted,

/s/ Christina Prusak Chianese

Nancy Chung

Christopher M. Egleson

Christina Prusak Chianese

Counsel for Louis Bacon

cc: Counsel of Record (via ECF)